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ATTORNEYS FOR RAMBUS INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

HYNIX SEMICONDUCTOR INC.,  
HYNIX SEMICONDUCTOR AMERICA  
INC., HYNIX SEMICONDUCTOR U.K.  
LTD., and HYNIX SEMICONDUCTOR  
DEUTSCHLAND GmbH.,

**Plaintiffs.**

vs.

RAMBUS INC.,

Defendant.

CASE NO.: CV 00-20905 RMW

**SUPPLEMENTAL STIPULATED  
[PROPOSED] ORDER DESIGNATING  
CERTAIN RAMBUS DOCUMENTS  
“CONFIDENTIAL – OUTSIDE COUNSEL  
ONLY”**

1  
2           WHEREAS Rambus Inc. ("Rambus") and Hynix Semiconductor Inc., Hynix  
3 Semiconductor America, Inc., Hynix Semiconductor U.K., Ltd, and Hynix Semiconductor  
4 Deutschland GmbH (collectively "Hynix") executed a Stipulated Motion and [Proposed] Order  
5 Designating Certain Rambus Documents "Confidential–Outside Counsel Only" that was filed  
6 with the Court on May 14, 2008 (the "Proposed Order");

7           WHEREAS Attachment A to the Proposed Order listed the bates numbers of the  
8 documents Rambus produced to Hynix on May 12, 2008;

9           WHEREAS three additional documents bearing bates numbers R8067664-7707,  
10 R8089722-9724, R8091605-1638 (the "Licensing Documents") were produced to Hynix and  
11 were omitted from Attachment A to the Proposed Order;

12           WHEREAS Elpida Memory, Inc. and/or Elpida Memory (USA) Inc. (collectively  
13 "Elpida") indicated that such documents are highly confidential and commercially sensitive and  
14 therefore asked that such documents be accorded the highest level of confidentiality available  
15 under the June 20, 2001 Protective Order (the "Protective Order");

16           WHEREAS Rambus and Hynix agree that such documents should be designated  
17 and treated as "CONFIDENTIAL–OUTSIDE COUNSEL ONLY";

18           WHEREAS the Protective Order requires a court order to designate a document as  
19 "CONFIDENTIAL–OUTSIDE COUNSEL ONLY";

20           WHEREFORE, Rambus and Hynix stipulate and agree as follows:

21           1.       The Licensing Documents shall be designated as "CONFIDENTIAL–  
22 OUTSIDE COUNSEL ONLY" and treated accordingly under the Protective Order, except as  
23 modified below or by agreement of the parties and Elpida.

24           2.       The Licensing Documents may be disclosed, given, shown, made available  
25 or otherwise communicated in any way to only the individuals identified in Paragraph 20 of the  
26 Protective Order, except that (i) under paragraph 20(a), the Licensing Documents can only be  
27 shown to outside attorneys retained by the parties in this action to consult on the litigation, (ii) the  
28 Licensing Documents may not be shared with the individuals identified in paragraph 20(b), and

1 (iii) Rambus may use such documents to conduct its ordinary business.

2 3. The Licensing Documents may only be used for purposes of the above-  
3 captioned litigation, except that Rambus may use such documents to conduct its ordinary business.

4 4. To avoid the necessity of a motion, Hynix and Rambus hereby request that  
5 this stipulation and order be approved by the Court.

6 DATED: October 31, 2008

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10 By: Carolyn Luedtke  
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12 Attorneys for RAMBUS INC.

14 DATED: October \_\_\_\_\_, 2008

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29 INC.; HYNIX SEMICONDUCTOR  
30 AMERICA, INC.; HYNIX  
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32 SEMICONDUCTOR DEUTSCHLAND  
33 GmbH

(iii) Rambus may use such documents to conduct its ordinary business.

3. The Licensing Documents may only be used for purposes of the above-captioned litigation, except that Rambus may use such documents to conduct its ordinary business.

4. To avoid the necessity of a motion, Hynix and Rambus hereby request that this stipulation and order be approved by the Court.

DATED: October , 2008

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Dated: 11/19/08